

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CHRISTINE MARAIS,

Plaintiff,

v.

CHASE HOME FINANCE, LLC

Defendant.

CIVIL ACTION NO.: 2:11-cv-314

JUDGE: GEORGE C. SMITH

MAGISTRATE: MARK R. ABEL

PLAINTIFF'S PROFFER OF DISCOVERY

Now comes Plaintiff, Christine Marais ("Ms. Marais"), by and through counsel, to proffer the following discovery requests in light of conversations with the Magistrate Judge and amongst counsel indicating the issues before the Court are legal in nature not necessitating additional discovery at this time. The proposed discovery requests and subpoenas have been attached as Exhibits A-H. The proposed discovery relates to the following:

1. Chase's knowledge of the specific disputes underlying Ms. Marais' Qualified Written Request ("QWR");
2. Documentation that Chase reported Ms. Marais' account as delinquent to the credit reporting agencies during the 60 day reporting moratorium under the Real Estate Procedures Act ("RESPA") at 12 U.S.C. § 2605(e)(3);
3. Discovery related to the misapplication of Ms. Marais' 2008 and 2009 misapplied payments.

Further, Chase has stipulated to the attached interest calculations regarding Ms. Marais' alleged misapplied payments. *See* Email from Counsel attached as Exhibit I.

Respectfully Submitted,
DOUCET & ASSOCIATES CO., L.P.A.

/s/ Troy J. Doucet
Troy J. Doucet, Trial Counsel (0086350)
Attorney for Plaintiff Christine Marais
700 Stonehenge Parkway, Suite 2B
Dublin, OH 43017
Telephone: (614) 944-5219
Fax: (818) 638-5548
E-Mail: troy@troydoucet.com

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of April, 2014, I caused this document to be electronically filed with the Clerk of Courts by using the ECF System, which will send a notice of electronic filing to all parties indicated on the electronic filing receipt, pursuant to Fed.Civ.R.P. 5(b)(3) and Loc.R. 5.2(b):

Daniel C. Gibson, Esq.
Nelson M. Reid, Esq.
Bricker & Eckler LLP
100 South Third Street
Columbus, Ohio 43215
dgibson@bricker.com
nreid@bricker.com
Attorneys for Defendant JPMorgan Chase
Bank, N.A., as successor by merger to Chase
Home Finance LLC

/s/ Troy J. Doucet
Troy J. Doucet, Trial Counsel (0086350)